

**EXHIBIT J**

ORIGINAL.

1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x

JANNIE PILGRIM, GIOVANNA HENSON,  
JESAN SPENCER and BRENDA CURTIS,

Plaintiffs, '07 CIV

-against- 6618

THE MCGRAW-HILL COMPANIES, INC.,

Defendant.

-----x

February 22, 2008

9:41 a.m.

Deposition of JANNIE PILGRIM, held  
at the offices of Proskauer Rose LLP, 1585  
Broadway, New York, New York, pursuant to  
Notice, before Mildred Cassese, a Registered  
Professional Reporter and Notary Public of  
the State of New York.

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1 J. Pilgrim

2 Q. So are you -- my question is, is it  
3 your contention that Ms. O'Connor discriminated  
4 against you in any way?

5                           **MR. SOLOTOFF:** Objection. She just  
6                           answered the question.

7                   **MR. RASIN:** She didn't answer the  
8 question.

9                           MR. SOLOTOFF: It was the same  
10                          question you asked before.

11                           **MR. RASIN:** Larry, I agree with you,  
12                           it was the same question, but I didn't get  
13                           an answer to that question.

14                           **MR. SOLOTOFF:** You can answer the  
15 question again.

16 A Repeat the question.

17 Q. Is it your contention that  
18 Ms. O'Connor discriminated against you?

19 A. I think making racial comments to me,  
20 in front of me, I think that's discriminatory.

21 Q. And what racial comment did  
22 Ms. O'Connor make?

23                   A. I've heard her make several racial  
24 comments. One is that black children do not get  
25 kidnapped. No one kidnaps black children.

1                           *J. Pilgrim*

2           Q.     Anything else?

3           A.     She made comments about what has Diana  
4       Ross done for her people. I've never seen her do  
5       anything for her people.

6                           I've heard comments if someone was  
7       black, they were articulate; if someone was  
8       Caucasian, they were just smart. I think those --  
9       things like that.

10          Q.     Anything else?

11          A.     At this time that I can recall? I  
12       mean, I can't think of anything else at this time.

13          Q.     Was there a time when you became a  
14       staffing consultant?

15          A.     Is that what the title was? Are we  
16       referring to McGraw-Hill?

17          Q.     I am.

18          A.     If that was what the title was called.

19          Q.     Do you remember when that was?

20          A.     Was that around 2004?

21          Q.     Well, are you guessing?

22          A.     Yeah, I'm guessing.

23          Q.     Did you get a promotion to staffing  
24       consultant in October of 2003?

25          A.     I mean, I don't know the dates, but I